

1 **ANTHONY L. ASHBY, ESQ.**

Nevada Bar No. 4911

2 **LADAH LAW FIRM**

517 S. Third Street

3 Las Vegas, NV 89101

litigation@ladahlaw.com

4 T: 702.252.0055

Attorney for Plaintiff

5 **UNITED STATES DISTRICT COURT**

6 **DISTRICT OF NEVADA**

7 DUSTIN BEAVERS, an individual,

8 Plaintiff,

9 vs.

10 GEICO INSURANCE AGENCY dba GEICO
11 INSURANCE COMPANY, a foreign
12 corporation; DOES I through X, inclusive and
13 ROE BUSINESS ENTITIES I through X,
inclusive,

14 Defendant.

CASE NO. 2:19-cv-00846-APG-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND TO
DEFENDANT'S MOTION TO DISMISS,
OR IN THE ALTERNATIVE, TO
SEVERE/BIFURCATE AND TO STAY
CLAIMS FOR BAD FAITH**

15 The above named parties, by and through their respective, undersigned counsel of record,
16 hereby stipulate to a one-week extension of time for Plaintiff to respond to Defendant's Motion to
17 Dismiss, or In the Alternative, To Sever/Bifurcate And to Stay Claims For Bad Faith, on file herein.
18 (ECF No. 5).

19 **REASONS FOR REQUESTED EXTENSION**

20
21 Defendant filed its Motion to Dismiss, or In the Alternative, To Sever/Bifurcate and To Stay
22 Claims For Bad Faith (ECF No. 5) on May 24, 2019, and Plaintiff's response is due on or before
23 June 7, 2019. However, due to the undersigned's upcoming trial schedule, Plaintiff requested, and
24 Defendant's counsel kindly agreed, to extend the deadline for Plaintiff to respond to Defendant's
25 Motion to June 14, 2019.

26
27 The parties further stipulate that the time for Defendant to prepare any Reply also be
28 adjusted accordingly.

1 The parties enter this stipulation in good faith, and not for reasons of delay or any other
2 untoward purpose.

3 DATED this 5th day of June, 2019.

DATED this 5th day of June, 2019.

4 MCCORMICK, BARSTOW, SHEPPARI LADAH LAW FIRM
5 WAYTE & CARRUTH, LLP

6 /s/: Wade M. Hansard, Esq.

7 WADE M. HANSARD
Nevada Bar No. 8104
8 JONATHAN W. CARLSON
Nevada Bar No. 8104
9 8337 W. Sunset Road, Suite 350
Las Vegas, Nevada 89113
10 *Attorneys for Defendant*

/s/Anthony L Ashby, Esq.

RAMZY PAUL LADAH
Nevada Bar No. 11405
ANTHONY L. ASHBY
Nevada Bar No. 4911
517 South Third Street
Las Vegas, NV 89101
Attorneys for Plaintiff

11
12
13 **ORDER**

14 IT IS SO ORDERED, this 6th day of June, 2019.

15
16 
UNITED STATES DISTRICT JUDGE

LADAH LAW
FIRM

